

PAUL M. WARNER, United States Attorney (#3389)
MICHELE M. CHRISTIANSEN, Assistant United States Attorney (#7259)
Attorneys for the United States of America
185 South State Street, #400
Salt Lake City, Utah 84111
Telephone: (801) 524-5682
Facsimile: (801) 524-6924

FILED
CLERK, U.S. DISTRICT COURT
2004 JUN 16 P 4: 53
DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

Defendants.

INDICTMENT

VIOS.: 18 U.S.C. § 2251 (Sexual
Exploitation of Children); 18 U.S.C. §
2252A(a)(5)(B) (Possession of Child
Pornography); 18 U.S.C. § 2 (Aiding
and Abetting).

The Grand Jury charges:

Judge Paul G. Cassell
DECK TYPE: Criminal
DATE STAMP: 06/16/2004 @ 15:04:13
CASE NUMBER: 1:04CR00084 PGC

COUNT I

On or about an unknown date between January 1, 2003, and September 11,
2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce a
minor to engage in sexually explicit conduct for the purpose of producing a visual

16

depiction of such conduct, to wit: Image entitled lotion²⁰05, which visual depiction was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).

COUNT II

On or about an unknown date between January 1, 2003, and September 11, 2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Image entitled playtime2 031, which visual depiction was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).

COUNT III

On or about an unknown date between January 1, 2003, and September 11, 2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Image entitled playtime2+049, which visual depiction was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).

COUNT IV

On or about an unknown date between January 1, 2003, and September 11, 2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Image entitled playtime²⁺⁰⁶⁶~~+006~~ *jr*, which visual depiction was produced using materials that have been mailed, shipped, and transported in interstate

and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).

COUNT V

On or about an unknown date between January 1, 2003, and September 11, 2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, A.R., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Image entitled playtime+080, which visual depictions were produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).

COUNT VI

On or about an unknown date between January 1, 2003, and September 11, 2003,

TERRI MICHELE ANDERSON and
KEITH ANDERSON,

defendants herein, did knowingly employ, use, persuade, induce, entice, and coerce certain minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Image #1, which visual depiction was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce, and did aid and abet each other therein; all in violation of Title 18, United States Code, Sections 2251(a) and 2 and punishable pursuant to Title 18, United States Code, Section 2251(d).


COUNT VII

On or about June 3, 2004, in the Northern Division of the District of Utah,

KEITH ANDERSON,

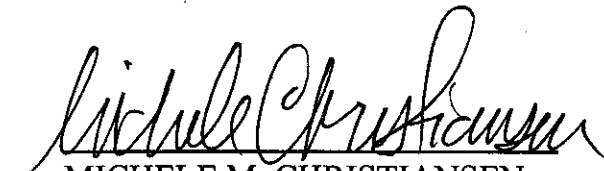
defendant herein, did knowingly possess materials, containing one or more images of child pornography, that were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

PAUL M. WARNER
United States Attorney



MICHELE M. CHRISTIANSEN
Assistant United States Attorney